

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

BRIDGESTONE SPORTS CO., LTD.,	)	
and BRIDGESTONE GOLF, INC.,	)	
	)	C.A. No. 05-132 (JJF)
Plaintiffs,	)	
	)	
v.	)	
	)	
ACUSHNET COMPANY,	)	
	)	
Defendant.	)	

**BRIDGESTONE'S SEVENTH  
NOTICE OF DEPOSITION PURSUANT TO RULE 30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiffs Bridgestone Sports Co., Ltd. and Bridgestone Golf, Inc. ("Bridgestone") shall take the deposition upon oral examination under oath of Defendant Acushnet Company ("Acushnet") beginning at 9:00 a.m., on the 28th day of June, 2006, and continuing from day to day until completed, in the offices of Paul, Hastings, Janofsky & Walker LLP, 875 15th Street, NW, Washington, DC 20005, or at such other time and place as may be agreed upon by counsel. The deposition will be recorded by stenographic means and may be videotaped, and is being taken for the purposes of discovery, for use at trial, and for such other purposes as permitted under the Federal Rules of Civil Procedure.

In accordance with Rule 30(b)(6), Acushnet shall designate one or more officers, directors, managing agents, or other persons to testify on its behalf concerning the matters set forth in Attachment A hereto.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Leslie A. Polizoti

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June 7, 2006

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## **ATTACHMENT A**

Notwithstanding any definition set forth below, each word, term, or phrase used in this Notice of Deposition is intended to have the broadest meaning permitted under the Federal Rules of Civil Procedure.

## **DEFINITIONS**

As used herein, the following terms are to be interpreted in accordance with the DEFINITIONS set forth in Bridgestone's First Set of Requests For Production of Documents and Things as though fully set forth herein.

In addition, the following phrase as used in this Notice is to be interpreted in accordance with the following definition:

37. The phrase "related patents or applications" means any patents and/or patent applications, whether issued, pending, abandoned, or otherwise, related to a patent, including any parents, continuations, continuations-in-part, divisions, provisionals, reexaminations, reissues, and foreign counterparts.

## **MATTERS ON WHICH EXAMINATION IS REQUESTED**

With respect to Acushnet's Titleist® Pro V1x™ and Titleist® Pro V1\* products (the "Products"):

1. The conception, research, design, and development of each and every model and version of the Products.
2. The reduction to practice of each and every model and version of the Products, including prototypes thereof.

3. The specifications of each and every model and version of the Products, including and without limitation the construction, material, chemical, and physical specifications thereof, and the manner, method and criteria in selecting such specifications.

4. Acushnet's manufacturing guidelines, including and without limitation the construction, material, chemical and physical characteristics and requirements of all models and versions of the Products, and reasons therefor, and all manuals, schematics, specifications, and subsequent, interim and/or final changes thereto.

5. The quality control and compliance employed by Acushnet in the design and manufacture of each and every model and version of the Products.

6. The testing of the Products, and all preliminary, intermediary and end product components, including and without limitation cores, cover layers and intermediate layers by or for Acushnet in developing and manufacturing of the Products.

7. The identity of each person substantially involved in the conception, research, design, development, testing, quality control and compliance, and manufacture of each and every model and version of the Products.

**CERTIFICATE OF SERVICE**

I hereby certify that on June 7, 2006, I electronically filed Bridgestone's Seventh Notice of Deposition Pursuant to Rule 30(b)(6) with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to:

Richard L. Horwitz  
Potter Anderson & Corroon

I further certify on June 7, 2006, copies of the foregoing document were served upon counsel of record in the manner indicated:

**BY HAND**

Richard L. Horwitz  
Potter Anderson & Corroon LLP  
1313 N. Market Street  
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**BY FEDERAL EXPRESS**

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